



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email and First Class Mail

February 26, 2019

Heather Rosentrater
Vice President, Energy Delivery
Avista Utilities Corporation
1411 East Mission Avenue
PO Box 3727
Spokane, WA 99220-3727

**RE: 2017 Natural Gas Standard Inspection – Avista Utilities, Ritzville/Goldendale
(Insp. No. 7260)**

Dear Ms. Rosentrater:

In May 2017 we conducted a standard inspection of your Ritzville/Goldendale District. As a result of this inspection we requested that Avista provide documentation to validate the maximum allowable operating pressure (MAOP) of 10 randomly chosen segments of pipeline. On November 2, 2018 Avista provided documentation for 3 segments of high pressure (HP) pipeline and on January 23, 2019 Avista provided documentation for the remaining 7 segments of intermediate pressure (IP) pipeline.

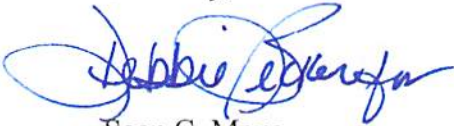
We have reviewed the documentation provided and accept it as validation of the current MAOP's of the 10 randomly chosen segments. As of January 24, 2018 we will consider the MAOP validation issue for the Ritzville District inspection No. 7260 closed with no further action necessary by Avista.

We would like to note that we disagree with Avista's assertion that there is no legal basis for the MAOP validation requirement on your IP systems. We believe that every segment of pipeline, regardless of installation date or its classification as transmission or distribution, must have an

MAOP that can be validated according to the requirements of CFR Part 192. We will continue to inspect and evaluate all jurisdictional systems in Washington state accordingly.

If you have any questions or if we may be of any assistance, please contact Scott Rukke at (360) 664-1241 or Joe Subsits at (360) 664-1322.

Sincerely,



Sean C. Mayo
Pipeline Safety Director

Enclosure

cc: Karen Cash, Manager, Integrity Management and Compliance, Avista
Michael Faulkenberry, Director of Natural Gas, Avista
Paul Good, Manager, Integrity Management and Compliance, Avista
Randy Bareither, Pipeline Safety Engineer, Avista